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October 23, 2018

Via Electronic Filing

Honorable Michael A. Hammer, U.S.M.J.

United States District Court

M.L. King, Jr. Federal Building & Courthouse

50 Walnut Street, 2nd Floor

Newark, New Jersey 07102

Re: Duane Marine Site Trust Fund v. General Cable Corporation
2:17-cv-03172-ES-MAH

Dear Magistrate Judge Hammer:

On October 9, 2018 (and with a clarification Order on October 10, 2018), the Court extended the deadline to file a motion to amend the pleadings, as well as the deadline to file a motion to add new parties. (ECF 38 and 40). The Court also directed the parties to resume their efforts to meet and confer to reach agreement on the remaining deadlines and to submit a joint status report on the results of their efforts on or before October 23, 2018. Pursuant to those Orders, the Parties jointly submit the following update.

The remaining deadlines in the Amended Case Management Order (ECF 32) and the potential for bifurcation are being diligently pursued in discussions by both parties. Since Your Honor's Order of October 9, 2018, the Parties have met and conferred regarding these proposed motions, the implications for attendant deadlines, as well as Plaintiff's proposal for bifurcation. The Parties will continue to meet and confer on those issues and should be able to inform the Court by November 1, 2018 as to the positions of the parties and whether a resolution has been reached. We respectfully submit that this would be well in advance of the next tele-conference with the Court, which is scheduled to take place on November 16, 2018.

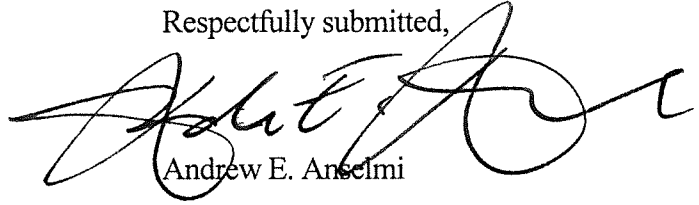
We thank Your Honor for the Court's kind attention to this matter.

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Honorable Michael A. Hammer, U.S.M.J.

October 23, 2018

Respectfully submitted,

A handwritten signature in black ink, appearing to read "A. E. Anselmi", with a large, stylized flourish at the end.

Andrew E. Anselmi

AEA/MWS

cc: Sean Collier, Esq.
Richard F. Ricci, Esq.
Maura W. Sommer, Esq.